

Date: September 26, 2002

## SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 10 CFR Part 30, Rules of General Applicability to Domestic Licensing of Byproduct Material

Current Burden/Responses: 160,919 hours/2,285 responses

Draft Proposed Burden/Responses: 199,389 hours/28,889 responses (21,583 Recordkeepers)

Final Proposed Burden/Responses: 247,239 hours/35,709 responses (21,583 Recordkeepers)

Frequency of Response: One-time; Every 10 years

Number of Respondents: 21,583

Reasons for Changes in Burden/Responses: The overall burden has increased by 86,320 hours from 160,919 hours to 247,239 hours. The increase is primarily due to the addition of 1 Agreement State and the increase in the number of Agreement State licensees from 15,847 to 16,253. The estimated number of Agreement State Licensees is expected to increase at a rate of 3.4 times that of NRC Licensees.

The overall reporting burden increased by 58,912 hours from 58,930 hours to 117,842 hours because of the increase in the number of Agreement States licensees from 15,847 to 16,253, with a corresponding increase in the number of responses and burden for sections 30.35(a)&(b); 30.36(g), and 30.50. This burden also increased because of the incorporation of sections 30.51(d)&(f) and 30.55(c) which were inadvertently omitted from the last clearance package. While the overall burden for Agreement States licensees increased by 51,820 hours, the overall burden for NRC licensees increased by only 7,092 hours from 19,783 hours to 26,875 hours. In addition, the burden for Section 30.36(j) was inadvertently covered under OMB clearance 3150-0028, but has been corrected and included in this renewal package which requires licensees to conduct a radiation survey of the site and to certify the disposition of all licensed material with the completion of NRC Form 314. This correction increased the reporting burden for by 22,000 hours (5,000 hours for NRC licensees and 17,000 hours for Agreement State licensees).

The overall recordkeeping burden increased by 27,608 hours from 101,789 hours to 129,397 hours because of the increase in the number of Agreement States licensees from 15,847 to 16,253, and in the number of recordkeepers for sections 30.34(e)(4) and 30.34(g). The recordkeeping burden for Agreement States licensees increased by 26,655 hours (from 74,129 to 100,784 hours). The burden for NRC licensees increased by 753 hours (from 27,860 hours to 28,613 hours), primarily because of the requirement for orders which was inadvertently omitted from the last clearance package.

There was change in cost because the hourly rate increased from \$121 to \$152.

The primary change since the draft package was the addition of the burden for orders, which increased the burden by 24,200 hours and the number of responses by 6,600. Corrections were made to the recordkeeping burden for Section 30.32(l) in which the hours per recordkeeper was 10 hours and should have remained at 1 hour, thereby reducing the recordkeeping burden by 198 hours from 220 to 22 hours. Corrections was also made to the reporting burden for Section 30.34(b) in which the hours per response was reduced to .5 hours and should have remained at 2 hours, thereby increasing the reporting burden by 1,848 hours from 616 to 2,464 hours. The burden for Section 30.36(j) which was inadvertently covered under OMB clearance 3150-0028, NRC Form 314, has been corrected and is included in this renewal package. This correction increased the

reporting burden by 22,000 hours (5,000 hours for NRC licensees and 17,000 hours for Agreement State licensees) and the number of responses by 220.

Level of Concurrence: Branch Chief  
Rulemaking and Guidance Branch  
Division of Industrial and Medical Nuclear Safety  
Office of Nuclear Material Safety and Safeguards

Recordkeeping Requirements in Accordance with the Retention Periods for Records/Rule: Yes

Search of the Information Requirements Control Automated System (IRCAS):  
IRCAS was searched, no duplication was found.

Abstract: 10 CFR Part 30 establishes requirements that are applicable to all persons in the United States governing domestic licensing of radioactive byproduct material. The application, reporting and recordkeeping requirements are necessary to permit the NRC to make a determination whether the possession, use, and transfer of byproduct material is in conformance with the Commission's regulations for protection of the public health and safety.

cc: B. St. Mary